

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:18-CV-17-FL**

TIMOTHY DANEHY,)	
)	
Plaintiff,)	
)	
v.)	
)	
EXPERIAN INFORMATION)	
SOLUTIONS, INC.; TRANS UNION)	
LLC; EQUIFAX, INC.,)	
)	
Defendants.)	
)	

**JOINT CONSENT MOTION FOR ENTRY
OF STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26 (c) of the Federal Rules of Civil Procedure, Plaintiff Timothy Danehy (“Plaintiff”), and Defendants, Experian Information Solutions, Inc., Trans Union, LLC, and Equifax, Inc. (“Defendants” and collectively with Plaintiff, “the Parties”) jointly move the Court for entry of the Stipulated Protective Order, attached to this motion as Exhibit A. In support of this motion, the Parties show the Court as follows:

1. Plaintiff’s Complaint alleges, in part, that the Defendants engaged in certain violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. The Parties are presently engaging in discovery that is anticipated to include the production of Plaintiff and Defendants’ confidential financial, business, proprietary, commercial, and/or personal income, credit and other confidential information of Plaintiff.

2. Rule 26(c) of the Federal Rules of Civil Procedure empowers the Court to enter an appropriate order to protect the confidentiality of the above-described information.

3. The parties agree that the proposed consent protective order will appropriately protect the confidentiality of information exchanged during discovery and, consequently, will facilitate discovery in this action.

4. For the above-stated reasons, good cause exists to enter the attached consent protective order.

WHEREFORE, Plaintiff and Defendants respectfully request that the Court adopt the [Proposed] Stipulated Protective Order attached hereto as Exhibit A.

This 28th day of March, 2018.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on March 28th, 2018, a true and correct copy of the above and foregoing Joint Consent Motion for Entry of Stipulated Protective Order has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel:

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I hereby certify that on March 28, 2018, I mailed by United States Postal Service and emailed the document to the following non-CM/ECF participant:

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